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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE
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15 JOHN DOE,
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v.
17 Plaintiff,

18 AMHERST COLLEGE, CAROLYN
19 MARTIN, JAMES LARIMORE, TORIN
20 MOORE, SUSIE MITTON SHANNON, an
21 LAURIE FRANKL,
22

Defendants.

Case No.: 16-mc-00128-RSL

DECLARATION OF MEGAN C.
DELUHERY IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
MOTION TO QUASH SUBPOENA

I, Megan C. Deluhery, am over the age of 18, have personal knowledge of all the facts stated herein and declare as follows:

1. I am a partner at Todd & Weld LLP, counsel for the Plaintiff in the underlying matter pending in the U.S. District Court for the District of Massachusetts (Civil Action No. 3:15-cv-30097 (the "Underlying Action")). My application to appear *pro hac vice* before this Court will be submitted as soon as the above miscellaneous action converted to a civil action.

2. Attached hereto as Exhibit A is a true and correct copy of Plaintiff's Amended Complaint and Jury Demand in the Underlying Action.

3. Attached hereto as Exhibit B is a true and correct copy of Plaintiff's Opposition to Defendants' Motion for Judgment on the Pleadings filed in the Underlying Action.

4. Attached hereto as Exhibit C is a true and correct copy of the Memorandum and Order Regarding Non-Party Eric Hamako's Motion for a Protective Order issued by the Magistrate Judge in the Underlying Action on June 17, 2016.

5. Attached hereto as Exhibit D is a true and correct copy of the Confidentiality Agreement among the parties to the Underlying Action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED at Boston, Massachusetts this 10th day of August, 2016.

Megan C. Deluhery (BBO#655564)
TODD & WELD LLP

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2016 I caused the foregoing and exhibits attached hereto to be electronically filed with the Clerk of the Court using the CM/ECF system and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants for the this miscellaneous action:

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/s/ Elizabeth A. Findley
Elizabeth A. Findley (WSBA #46990)